

UNITED STATES DISTRICT COURT

for the

____ District of _____

____ Division

Case No. 2:22-cv-01671-BHH-MHC

(to be filled in by the Clerk's Office)

Reginald T. Smith

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) Yes NoCentral NET works- Retail Group LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

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2022 MAY 26 PM 3:22

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

*Reginald T. Smith
Po Box 1454 / 381 Dingle Lane
Saint Stephen Berkeley
SC. 29479
(843) 901-9365
ReginaldT\$@gmail.com*

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name
Street Address
City and County
State and Zip Code
Telephone Number

*Marvin's Building Supply
309 Rembert C. Dennis Blvd
Moncks corner SC, Berkeley
SC 29461
843 761-8588*

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (*check all that apply*):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law (specify the federal law): *28 13-31 EO Employment Discrimination
29-0201-71 Labor Standards Act
29-0754 discrimination 42 1981 JB race*



Relevant state law (specify, if known): *SC code 1-13-70 SC Reg rule sect 6524*



Relevant city or county law (specify, if known):

42 2000 RA

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- Failure to hire me.
- Termination of my employment.
- Failure to promote me.
- Failure to accommodate my disability.
- Unequal terms and conditions of my employment.
- Retaliation.
- Other acts (specify): _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)**C. I believe that defendant(s) (check one):**

- is/are still committing these acts against me.
- is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

<input checked="" type="checkbox"/>	race	<u>See Attachment A</u>
<input type="checkbox"/>	color	_____
<input type="checkbox"/>	gender/sex	_____
<input type="checkbox"/>	religion	_____
<input type="checkbox"/>	national origin	_____
<input type="checkbox"/>	age (year of birth)	(only when asserting a claim of age discrimination.)
<input type="checkbox"/>	disability or perceived disability (specify disability)	_____

E. The facts of my case are as follows. Attach additional pages if needed.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

B. The Equal Employment Opportunity Commission (check one):



has not issued a Notice of Right to Sue letter.



issued a Notice of Right to Sue letter, which I received on (date)

Sept. 28, 2021

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):



60 days or more have elapsed.



less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Wherefore I, the plaintiff would like to resolve this matter peacefully if possible, and request/pray judgement against defendant Marvin's representatives, for restitution in the amount of \$20,000 Economic civil tort, \$270,000 and psychological damages \$2500.00 as well as compensatory damages \$150,00.00 plus costs and fees in the amount of \$5000.00 and respectfully ask this court to leave no move for punitive damages. I was violated by fraud, negligence unprofessional conduct race and never properly noticed or contacted about job opportunities

or given the proper notices that would have allowed me the ability to properly negotiate, which caused a deprivation of my civil liberties and constitutional secured rights

or given the proper notices that would have allowed me the ability to properly negotiate, which caused a deprivation of my civil liberties and constitutional secured rights

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1

Name _____
Job or Title (*if known*) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address (*if known*) _____

Marvin's Building Supply
Retail Hardware business
309 Rembert C. Dennis BLVD
Moncks Corner Berkeley
SC. 29461
(843) 761-8588

Defendant No. 2

Name _____
Job or Title (*if known*) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address (*if known*) _____

Defendant No. 3

Name _____
Job or Title (*if known*) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address (*if known*) _____

Defendant No. 4

Name _____
Job or Title (*if known*) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address (*if known*) _____

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name
Street Address
City and County
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(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Other federal law (*specify the federal law*):

*28-1331 EO Employment Discrimination 29 OZ017L
Relevant state law (*specify, if known*): SC. code 1-13-70 SC Reg Rule Sec. -6524*

Relevant city or county law (*specify, if known*):

Labor standards act

Labor standards act

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

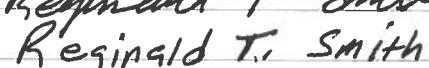
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Apr. 1 4, 2022

Signature of Plaintiff



Printed Name of Plaintiff

**B. For Attorneys**

Date of signing: _____

Signature of Attorney



Printed Name of Attorney



Bar Number



Name of Law Firm



Street Address



State and Zip Code



Telephone Number



E-mail Address

